

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DR. PETER LAWRENCE,

Plaintiff,

v.

NORTHWELL HEALTH, INC.

Defendant.

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: Civil Action No. 19-CV-7448-(KMK)(JCM)
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:
: **STIPULATION AND**
: **PROTECTIVE ORDER**
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
IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for plaintiff Dr. Peter Lawrence ("Plaintiff") and defendant Northwell Health, Inc. ("Defendant"; collectively, the "Parties"), that Defendant will produce in unredacted form certain documents in response to Plaintiff's discovery requests in this matter that Defendant has previously designated as attorney-client privileged and/or protected against disclosure by the work-product doctrine, identified as documents 1-11 on Defendant's February 8, 2021 privilege log (the "Privileged Documents").

IT IS FURTHER STIPULATED AND AGREED that Defendant's production of any Privileged Documents shall not constitute a waiver of any privileges or protections against discovery, the introduction of such documents or information into evidence, or the use of such documents or information in this matter or in any other federal or state proceeding in any way. The Parties are submitting this stipulation to the Court consistent with Fed. R. Evid. 502(d) and with the intention that if Plaintiff uses, and Defendant objects to the use of, such documents, the Parties agree that Defendant may assert its objections as if the documents had not previously been divulged to Plaintiff's counsel and their prior disclosure shall not be used against Defendant

in resolving any such dispute.



Dated: February 12, 2021

SUSSMAN & ASSOCIATES

By:  2/12/21
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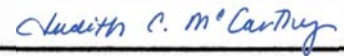
Attorneys for Plaintiff Dr. Peter Lawrence

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Attorneys for Defendant Northwell Health, Inc.

SO ORDERED:

 2-12-2021
Hon. Judith C. McCarthy
United States Magistrate Judge